

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: : Case No.: 18-15216-MDC  
John R. Lyons :  
Debtor : Chapter 13

**MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
OF BLUE RIVER CAPITAL, LLC**

1. Movant is Blue River Capital LLC, the owner of the real property located at 2836 Michael Road, Philadelphia Pennsylvania (the “Property”).

2. Movant acquired title to the Property by sheriff’s deed acknowledged December 17, 2018, and recorded January 4, 2019. A true and correct copy of movant's deed is attached hereto and marked “Exhibit A.”

3. Respondent is the debtor, who filed this case on August 6, 2018.

4. Movant acquired title to the Property following succesful bid at a Sheriff sale held in a state court action in which the debtor was a defendant. (*Pennsylvania Housing Finance Agency v. Lions*, Philadelphia Court of Common Pleas #16070376).

5. Respondent is in possession of the Property.

6. Respondent has no ownership interest or equity in the Property nor does have any right to possession.

7. Movant seeks relief from the automatic stay in order to proceed with its rights under state law, including regaining possession of the Property.

Wherefore, movant requests that the court lift the stay imposed by the bankruptcy filing to permit it to exercise and enforce its rights and remedies in state court and order further relief as is

just and proper.

*Respectfully submitted,*

By:



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